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Attorneys for Defendant Cody and Debby Easterday

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re)	Lead Case No. 21-00141-11 (WLH)
)	Jointly Administered
EASTERDAY RANCHES, INC., et al.,)	
)	
Debtor(s). ¹)	
)	
)	
)	Adversary
WASHINGTON TRUST BANK, a Washington)	Proceeding No. 21-80010-WLH
banking corporation,)	
)	
Plaintiff,)	JOINT MOTION TO ENLARGE TIME TO
)	FILE ANSWER AND TO REQUEST
v.)	STATUS CONFERENCE
)	
EASTERDAY RANCHES, INC., a Washington)	
corporation; EASTERDAY FARMS, a)	
Washington general partnership; CODY)	
EASTERDAY, individually; DEBBY)	
EASTERDAY, individually; KAREN)	
EASTERDAY, individually and in her capacity as)	
personal representative of the Estate of Gale)	
Easterday,)	
)	
Defendant(s).)	
)	

¹ The Debtors along with their case numbers are as follows: Easterday Ranches, Inc. (21-00141) and Easterday Farms, a Washington general Partnership (21-00176).

1 Pursuant to FRBP 9006(b)(1), defendants Cody Easterday, Debby Easterday, and Karen
2 Easterday (collectively “Defendants”), through their respective counsel, hereby jointly move the
3 court for an extension of time to file the Defendants’ Answer in this adversary proceeding. Pursuant
4 to the court’s April 27, 2021 Order Granting Joint Motion to Enlarge Time to File Answer (“Order”),
5 Defendants’ Answer would be due on May 3, 2021. Defendants request that the Court extend the
6 Answer deadline to a new date to be determined after a status conference with the court, because good
7 cause exists based on the reasons described in this Motion.

8 On April 28, 2021, this Court approved the Cooperation Agreement negotiated among
9 several parties, including plaintiff Washington Trust Bank (“WTB”). Defendants understand that
10 WTB plans to consent to an injunction of its pursuit of its claims in this action in a form consistent
11 with the form of injunction attached to the Cooperation Agreement. Based on such contemplated
12 injunction with respect to WTB, Defendants seek confirmation from the court that the other
13 deadlines in this case, including the Defendants’ answer deadline, the deadlines and dates under
14 the Court’s April 13, 2021 Notice of Scheduling Conference, and WTB’s deadline to seek remand,
15 are stayed. Defendants request a status conference with the court to address these matters, the
16 timing of the injunction to be executed by WTB, and to confirm the stay requested herein will
17 occur.

18 Beginning on Thursday, April 29, 2021, Defendants have attempted to ascertain WTB’s
19 position concerning this Motion through email communications with WTB’s counsel. But as of
20 the time this Motion was finalized on Monday, May 3, 2021, WTB was not yet ready to provide
21 its position. Because Defendants’ deadline to file an Answer is today, Defendants believe they
22 must file this Motion today, even though WTB has not yet provided its position on the relief
23 requested. That being said, WTB’s counsel confirmed that, based on the Cooperation Agreement,
24 WTB has no plans to file for default.

1 Based on the foregoing reasons, Defendants believe that good cause exists to extend their
2 Answer deadline on terms confirmed in a status conference with the court.

3 Dated this 3rd day of May, 2021.

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